

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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DAVID EDMOND, CAROL EDMOND
And TOM EDMOND,

Plaintiffs,

- Against -

LONGWOOD CENTRAL SCHOOL
DISTRICT, SUFFOLK COUNTY, SUFFOLK
COUNTY POLICE DEPARTMENT, SUFFOLK
COUNTY POLICE OFFICER EDWARD
ZIMMERMAN, in his individual and official
capacities, SUFFOLK COUNTY POLICE
OFFICER SGT ISNARDI, in his individual and
official capacities, SUFFOLK COUNTY
POLICE OFFICERS "JOHN AND JANE DOES
1-10," in their individual and official capacities,
LONGWOOD SUPERINTENDANT MICHAEL
R. LONERGAN, in his individual and official
capacity, PRINCIPAL MARIA CASTRO in her
individual and official capacity, LONGWOOD
ASSISTANT PRINCIPAL SCOTT REESE,
in his individual and official capacity,
LONGWOOD SECURITY GUARDS "JOHN
AND JANE DOES 1-10," in their individual
and official capacities and JOHN AND JANE
DOE # 1-10, in their individual and official
capacities,

Defendants.

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**DECLARATION IN
OPPOSITION**

CAROLINE B. LINEEN, ESQ., an attorney duly admitted to practice law in the United States District Court for the Eastern District of New York, hereby deposes and says subject to the penalties of perjury:

1. I am a member of the law firm of SILVERMAN & ASSOCIATES, attorneys for the defendants, LONGWOOD CENTRAL SCHOOL DISTRICT, MICHAEL LONERGAN, MARIA CASTRO, SCOTT REESE, and SCOTT PARTLOW. I am fully familiar with the facts

and circumstances of this matter based on my review of the file maintained by my office in defense of this litigation.

2. This Declaration is submitted in opposition to the plaintiffs' motion to amend their Complaint.

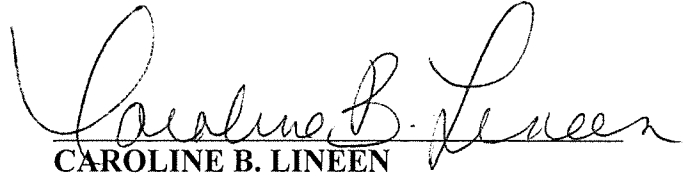
3. As is more fully set forth in the accompanying Memorandum of Law, the plaintiffs' motion should be denied in the entirety because (1) the plaintiffs have not established good cause for the proposed amendments; (2) the proposed amendments would be futile; and (3) the plaintiffs failed to articulate a legitimate basis for a further deposition of defendant Reese in excess of the seven hours he was already deposed.

4. In opposition to the plaintiffs' motion, annexed hereto as Exhibits "A"- "K" are the following:

- A. Plaintiffs' Proposed Amended Complaint;
- B. Initial Discovery Schedule Order, So-Ordered August 1, 2016;
- C. Defendants' Rule 26 Automatic Disclosure;
- D. Defendants' Supplemental Rule 26 Automatic Disclosure;
- E. Suffolk County Defendants' Initial Disclosures;
- F. Defendants' Response to Plaintiffs' Requests for Admission and Plaintiffs' Requests for Admission;
- G. Defendants' Second Supplemental Response to Plaintiffs' First Set of Document Demands, with Exhibits "A" and "B";
- H. Transcripts of 50-h Examinations of Plaintiffs, David and Carol Edmond;
- I. Defendants' Response to Plaintiffs' First Set of Interrogatories;
- J. Stipulation Resolving Disciplinary Proceedings; and

K. April 24, 2017 Letter from Caroline B. Lineen to Plaintiffs' Counsel.

Dated: White Plains, New York
April 5, 2018



CAROLINE B. LINEEN